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10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

15 DOUGLAS JAE WOO KIM,

16 Defendant.

17 Case No. 3:21-CR-00164-CRB-1

**STIPULATION AND [PROPOSED]  
 ORDER MODIFYING CONDITIONS OF  
 RELEASE**

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18 Plaintiff UNITED STATES OF AMERICA and Defendant DOUGLAS KIM  
 19 agree and stipulate as follows:

- 20 1. WHEREAS, on April 24, 2024, this Court released defendant on a  
 21 \$1,000,000.00 (one million dollar) secured bond. (Dkt.174). Among  
 22 the other conditions imposed by the order for release, Mr. Kim was  
 23 required to reside with his parents in New York City and his parents  
 24 were required to act as third-party custodians secured by the million-  
 25 dollar bond. The parents have posted the secured bond;
- 26 2. WHEREAS, the SDNY probation office has reported no issues with  
 27 Mr. Kim's compliance with the terms of his pretrial release;

- 1       3. WHEREAS, Mr. Kim moves this Court to allow for one modification  
2                  and a few exceptions to his conditions of release as follows. Currently,  
3                  Mr. Kim is to remain in the Southern & Eastern District of New York  
4                  (Dkt 174, Exh. A., item 7). He has requested that the pretrial services  
5                  office be given discretion to permit him on a case-by-case basis to travel  
6                  with his parent(s) to Bergen County, New Jersey for the specific  
7                  purpose of continued dental care visits. Mr. Kim has also requested  
8                  permission to travel to Litchfield County, Connecticut the weekend of  
9                  September 13<sup>th</sup> to September 15<sup>th</sup>, 2024 for a trip with his parents;
- 10       4. WHEREAS, Mr. Kim currently is only allowed to use one designated  
11                  and monitored computer (Dkt 174, Exh. A., item 11), but requests an  
12                  exception to use a computer at a certified testing center to take  
13                  standardized tests required for applications to graduate schools. The  
14                  functionality of the computers at these testing centers is restricted to the  
15                  exclusive purpose of administering the test. Additionally, the test taker  
16                  and his/her usage of the computer is heavily monitored by a proctor  
17                  who will immediately dismiss the test-taker in any case of violation;
- 18       5. WHEREAS, Mr. Kim finally has requested that his monitored computer  
19                  privileges be expanded for any purpose except for engaging in the  
20                  concerning activities, namely soliciting loans, engaging in financial  
21                  transactions, or opening financial accounts (Dkt 174, Exh. A., item 11).  
22                  Mr. Kim has indicated that he would like to spend this time leading up  
23                  to his trial productively and would like to use the computer to take  
24                  online courses, read news, or to use his background and skillset to  
25                  support a nonprofit organization, CEOworks, that helps reentry for  
26                  recently released individuals. Mr. Kim proposes changing the condition  
27                  to: "Defendant may only use one computer approved by U.S. Pretrial  
28                  Services. The approved computer will be subjected to computer

1 monitoring by U.S. Pretrial Services. This computer will remain in the  
 2 possession and control of his parents who will only allow him to use it  
 3 at times approved by U.S. Pretrial Services and may not be used to  
 4 engage with social media platforms or in any financial transactions  
 5 including: applying/soliciting for loans or other forms of credit  
 6 (personal or business); purchasing products or services using a loan or  
 7 other forms of credit; purchasing, selling, trading of securities,  
 8 including those involving crypto-currency; opening financial accounts  
 9 including bank accounts, credit accounts, brokerage accounts, or  
 10 cryptocurrency accounts; and gambling.”; and

11       6. WHEREAS, neither the probation office for the SDNY nor the pretrial  
 12 services office for the Northern District of California nor the  
 13 undersigned AUSA, objects to Mr. Kim’s requests for these exceptions  
 14 or his proposed modification of item 11.

15                  The undersigned certifies that he has obtained approval from counsel for the  
 16 government to file this stipulation and proposed order.

17                  **IT IS SO STIPULATED.**

18  
 19                  Dated: August 26, 2024

ISMAIL J. RAMSEY  
 United States Attorney

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 21                  Dated: August 26, 2024

By: /s/ Noah Stern  
 NOAH STERN  
 Assistant United States Attorneys

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ROGERS JOSEPH O'DONNELL

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By: /s/ Dean D. Paik  
 DEAN D. PAIK  
 Attorneys for Defendant  
 DOUGLAS JAE WOO KIM

## [PROPOSED] ORDER

Having considered Mr. Kim's requests, and finding good cause therefore, the Court GRANTS Mr. Kim's requests for exceptions and modification to his conditions of release as described in the stipulation.

## IT IS SO ORDERED.

Dated: \_\_\_\_\_, 2024

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**UNITED STATES MAGISTRATE JUDGE**